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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GRETHUR
DIRECTOR

December 14, 2018

CERTIFIED MAIL: 7014-0150-0001-0741-1286

Mr. Scott Wright
Environmental Health and Safety
Diamond Chrome Plating
604 South Michigan Avenue
Howell, Michigan 48843

Dear Mr. Wright:

SUBJECT: National Pollutant Discharge Elimination System (NPDES)
NPDES Permit No. MI0058204
Designated Name: Diamond Chrome Plating Inc (DCP)
First Amended Consent Decree (FACD) Case No. 03-1862-CE
Violation Notice and Enforcement Notice Follow-Up Letter

This letter is written in response to Diamond Chrome Plating's submittal dated October 19, 2018, which was sent in response to VN EN VN-008450 from the Department of Environmental Quality (DEQ), Water Resources Division (WRD), dated September 4, 2018, in regards to compliance with Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); NPDES Permit No. MI0058204 (NPDES Permit), which was issued on November 14, 2014, and effective October 1, 2015; and the FACD referenced above.

We note that DCP commented on the first portion (which lists violations) of the September 4, 2018, letter. We have integrated these issues into our responses but are following the numbering of the second section, which lists requested actions. Please complete the remaining items below, unless otherwise specified, by **January 31, 2019**. If any items cannot be completed by this date, please provide a schedule for their completion.

1. **PFAS Reduction Plan.** DCP submitted a PFAS Reduction Plan in Attachment 4 of its response.
 - a. **Storm Water Discharges.** The general plan for the reduction of PFAS from storm water is acceptable, although we caution DCP that initial PFOS reduction from the peat-based treatment system may not be sustained long term, so carbon units should be designed appropriately unless DCP plans to replace the peat-based media on a more frequent basis. The specified method of analysis, however, is not acceptable, since Environmental Protection Agency (EPA) Method 537, revision 1.1, is only acceptable for use in drinking water. DCP shall use either the isotope dilution method (also referred to as EPA Method 537,

modified) or ASTM D7979. Please ensure that the laboratory that you choose has a good quality assurance/quality control (QA/QC) program.

- b. **Groundwater Infiltration.** DCP is required to comply with the NPDES Permit limit for total Chromium by December 31, 2019, under the terms of the FACD. The DEQ, WRD, agrees that, consistent with this requirement, groundwater discharges (represented by samples taken at 001A when treated storm water discharges are not discharging) shall be compliant by **December 31, 2019**, with the Water Quality Standard for PFOS of 12 ng/l.

PFAS results from DCP groundwater monitoring to-date and a plan for how DCP will address infiltration of contaminated groundwater to the storm sewers were not provided as requested. Please submit data collected to-date, and a plan and schedule for eliminating contaminated groundwater infiltration into the storm sewer. Methods used to address PFAS infiltration should be designed to accommodate current and updated PFAS sampling results.

- c. **Discharge of Contaminated Groundwater to City Sanitary Sewers.** Please be advised that any disposal of PFAS-contaminated groundwater to the City of Howell (the City) sanitary sewer must be specifically authorized by the City. In addition, DCP must comply with the City's requirements to eliminate contaminated groundwater infiltration to the sanitary sewer.
2. **PFAS Monitoring.** DCP proposed an alternative monitoring plan to that required by the DEQ, WRD. This plan is not approved, although we will add a monitoring reduction clause to the proposed Administrative Consent Order so that the monitoring frequency may be reduced upon the DEQ, WRD's District approval. DCP was required to begin the required monitoring in September at Monitoring Points 001A and 001B in accordance with the September 4, 2018, directive. Results of monitoring shall be submitted as a "PFAS Non-POTW Monitoring Report," unless otherwise directed by the DEQ, WRD, compliance staff.
3. **Effluent Limit Violations.** We have no comments on your response, which was contained in Response No. 2 of Mr. Colmer's letter. In regard to Response No. 1, no PFAS data (either requested groundwater or referenced storm water) were attached, so we cannot comment on the assertions in this section of the letter. Please understand that the DEQ, WRD, does not require and did not request monitoring at the Walnut Street manhole. However, please be aware that your NPDES Permit requires compliance at Monitoring Point 001A, regardless of upstream dilution or potential additional pollutant concentrations. Further, DCP must obtain specific authorization from the City for any discharges from the groundwater treatment system extraction wells to the City's sanitary sewer.
4. **SWPPP Requirements.** The DEQ, WRD, has the following responses to Mr. Colmer's letter.

- a. West roof inspection forms that meet FACD and NPDES requirements were enclosed with your response. Unfortunately, the last quarterly report showed that these forms were not used from June-October 6, 2018. DCP therefore continued to be in noncompliance with the FACD and its NPDES Permit. Please document west roof inspections using the form submitted with your October 19, 2018, letter and provide the DEQ, WRD, with the date that the revised west roof form began to be used.
- b. DCP did not revise the "Duct Designation Plan" to include all air pollution control equipment exposed to storm water as required. Please submit the revised Plan. In addition, as discussed in Item 3b of the violations section of the September 4, 2018, letter, all leaks must be repaired as required in the FACD. DCP shall develop a method to clean and find leaking areas for repair if locating leaks after cleaning is an issue.

The sheets provided were daily inspection forms and do not track the number of leaks by duct segment. Under Paragraph 5.3e, DCP is required to replace duct segments that have leaked ten (10) times. Therefore, DCP must track the number of leaks by duct segment. We require DCP to provide tracking for its current duct segments by designated label. An example of the type of tracking needed was provided to DCP for the previous ductwork and is enclosed with this letter. A similar tracking mechanism is recommended, with updated duct designations and leak information. We note that the duct replacements were required by Paragraph 5.3e of the FACD, since leaks per segment were at or approaching ten (10).

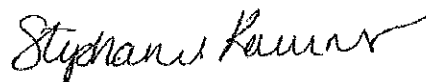
- c. DCP did not review its Storm Water Pollution Prevention Plan (SWPPP) and propose needed modifications, as required, to document that facility personnel will inspect and document inspections of all pollution control equipment exposed to storm water. Please submit the revised SWPPP as requested.
 - d. DCP did not revise its SWPPP to include updated documentation of recent releases under Table 2 of the proposed revised SWPPP, as required. Proposed SWPPP revisions shall be submitted via MiWaters as minor modifications to the NPDES Permit.
5. **Certified Operator.** We recommend that on-site DCP staff obtain the required certifications as soon as possible. Per our e-mail request, please provide the date Mr. Tom Barzyk of BB & E was contracted for service as DCP's certified operator for carbon B-3b, and a copy of the contract or other documentation showing that he was the responsible person in charge of the treatment system during the specified time period.
 6. **Incomplete Operations and Maintenance (O & M) Plan.** DCP has requested until January 31, 2019, to submit another revision of its proposed O & M Plan to address the deficiencies outlined in the enclosure to our letter dated September 4, 2018. Please

ensure that this version addresses those deficiencies. A complete O & M Plan was due on or before March 1, 2015.

7. **Calibration of Equipment.** The proposed plan for calibration of the effluent flow meter is acceptable. Please provide a schedule for your proposed plan.
8. **Method of Analysis.** DCP is required to use an EPA-approved method for the analysis of wastewater, when available, for all effluent analyses conducted for NPDES reporting. ASTM E70 is not an EPA-approved method listed in Title 40 of the Code of Federal Regulations (40 CFR), Part 136, Guidelines Establishing Test Procedures for the Analysis of Pollutants. DCP shall use an EPA-approved method listed in 40 CFR, Part 136.3, Identification of Test Procedures, Table 1B, for analysis of pH and report to the DEQ, WRD, the approved method used.
9. **Bypass Report.** An incorrect reference was made in the September 4, 2018, letter. DCP is required to sample for volatiles during a bypass of treatment during the next two bypass events to satisfy the requirements under Part I.A.7 of your NPDES permit, the Short-Term Waste Characterization Study. Although several bypass events have occurred since issuance of the permit, DCP has not yet sampled bypassed wastewater for the volatile parameters listed in 40 CFR, Part 122, EPA Administered Permit Programs: The National Pollutant Discharge Elimination Program, Appendix D, Table II, and must monitor two bypass discharge events should additional bypass events occur prior to permit reissuance.
10. **Sampling.** DCP has committed to icing samples during operating hours, which should include any time DCP employees are present. Please provide a schedule to provide refrigeration for your samples by no later than June 30, 2019.
11. **Contact.** No contact information was provided as requested. Please provide the name and contact information for DCP's replacement Project Coordinator as required by Paragraph 13.1 of the FACD.

Should you require further information regarding this follow up letter, please contact me or Ms. Carla Davidson, Lansing District Office, WRD, at 517-243-1249; davidsonc@michigan.gov; or DEQ, WRD, Lansing District Office, 525 West Allegan Street, Constitution Hall, 1st Floor South, P.O. Box 30242, Lansing, Michigan 48909-7742.

Sincerely,



Stephanie Kammer, District Supervisor
Lansing District Office
Water Resources Division
517-897-1597
kammers@michigan.gov

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Enclosure: Duct Leak Tracking Sheet

cc: Mr. Jerry Chinn, President/Owner, DCP
Mr. Jim Colmer, BB & E
Mr. Brian Negele, Department of Attorney General
Mr. Jon Russell, DEQ, WRD
Mr. David Pingell, DEQ, WRD
Ms. Carla Davidson, DEQ, WRD
Ms. Maureen Nelson, DEQ, WRD
Mr. Dan McGeen, DEQ, Air Quality Division
Ms. Rebecca Taylor, DEQ, Remediation and Redevelopment Division
Mr. Brian Grochowski, DEQ Waste Management and Radiological Protection